FCC-05-143 proposes eliminating the telegraphy component from the requirements for an amateur radio operator's license. In so doing, it specifically states it is not about eliminating CW from the Amateur Radio Service. Specifically,

> "3. Based upon the petitions and comments, we propose to amend our amateur service rules to eliminate the requirement that individuals pass a telegraphy examination in order to qualify for any amateur radio operator license. We believe that this proposal, if adopted, would (1) encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators; (2) eliminate a requirement that we believe is now unnecessary and that may discourage amateur service licensees from advancing their skills in the communications and technical phases of amateur radio; and (3) promote more efficient use of the radio spectrum currently allocated to the amateur radio service."

As a Volunteer Examiner and Amateur Extra Class Licensee in the Amateur Radio Service, as well as, a General Radiotelephone Operator I am in full and complete agreement with this Executive Summary and the discussions within FCC-05-143. Indeed, most enlightening are the many secondary policy "reflections" on the FCC's administrative and regulatory responsibilities with regard to the Amateur Radio Service. I believe these simple, yet eloquent, reflections and this NPRM as a whole can be seen to emanate from the historical roots of the Radio Act of 1912 and the initial regulations governing radio communication in this country. It may be noted that to obtain a First Class Amateur license in 1912...

> "The applicant must have a sufficient knowledge of the adjustment and operation of the apparatus, and of the regulations of the International Convention and acts of Congress in so far as they relate to interference with other radio communication and impose certain duties on all grades of operators. The applicant must be able to transmit and receive in Continental Morse, but no speed rate will be prescribed." (U.S. Department of Commerce and Labor, September 28, 1912.)

And how, perhaps remarkably, the spirit of these words is repeated 93 years later in the present NPRM FCC-05-143...

> "16. In the *Restructure Report and Order*, the Commission concluded that the public interest would be served best by reducing the telegraphy examination requirement for an amateur radio operator license to the minimum standard that would satisfy the *Radio Regulations,* namely, the requirement that a control operator of a station prove that he or she can ensure the proper operation of that station.69 Consequently, the Commission eliminated as licensing requirements the thirteen wpm and twenty wpm telegraphy examinations, and retained only the minimum telegraphy requirement of five wpm.70 As a number of petitioners note, the Commission could not have eliminated the five wpm examination in the *Restructure Report and Order,* due to the then-effective *Radio Regulations* requirement.
>
> "37. Discussion

> Requests that written examinations be revised168 to test "improved technical and operating skills" or increased "technical level" are vague because there is no objective means to measure technical and operating skills. Also, the purpose of the written examinations, under our rules, is not to determine whether a person has achieved a particular level of skill, but rather to determine whether an individual can properly operate an amateur station."

In fact, regulations on code speed, or wpm rates, were added only following the re-introduction of the Amateur Service at the conclusion of World War I. At that time, the telegraphy requirement served the sole purpose of limiting the population of licensed radio amateurs - not to increase either their technical or operating abilities. These abilities had independently evolved as a result of radio amateurs' service in the Armed Forces and the new expertise required by developments in radio technology.

Telegraphic CW modulation (A1A, F1A) are digital modes of radio communication, using more bandwidth that PSK31 (G1B) and less bandwidth than RTTY (F1B, F2B). Like all modes enjoyed by hams, CW will be in use for decades to come. It should be noted further, that no communication mode once introduced and used by licensed radio amateurs has ever been eliminated from use in the Amateur Radio Service.

I have full faith that those of us who use CW now will continue to use it. We will teach its utility to many other radio amateurs. Whether CW use grows has little to do with how the FCC regulates the Amateur Radio Service, as well-summarized in NPRM FCC-05-143. The Amateur Radio Service is what we radio amateurs make it. Its future is ours. I do not see the Amateur Radio Service in decline, but perhaps some radio amateurs are in decline. We should help them and future radio amateurs understand the full potential for radio communication, with all its modes, in the 21st Century.

Yours,

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